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9 *Attorney for Plaintiff In conjunction with Legal Aid Center of*
10 *Southern Nevada Pro Bono Project*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 TERRELL DESHON KEMP, SR.,

14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT, et al.,

18 Defendants.

CASE NO: 2:18-cv-00169-RFB-BNW

19 **STIPULATION AND ORDER TO EXTEND**
20 **TIME FOR PLAINTIFF TO RESPOND TO**
21 **DEFENDANT LVMPD'S MOTION FOR**
22 **SUMMARY JUDGMENT**
23 (First Request)

24 COMES NOW, Plaintiff Terrell Deshon Kemp, Sr., ("Plaintiff"), by and through his
25 counsel, Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro*
26 *bono publico*, and Defendants Las Vegas Metropolitan Police Department ("LVMPD"), by and
27 through their counsel, Lyssa S. Anderson, Esq., of the law firm of Kaempfer Crowell, and
28 hereby stipulate and agree to extend the time for Plaintiff to Respond to LVMPD's Motion for
Summary Judgment (ECF #86).

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first
request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary
Judgment.

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Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has caused, and continues to cause, disruption to the practices of counsel involved in this case. In addition, Plaintiff is incarcerated in Ely State Prison and Plaintiff's Counsel has had difficulty communicating with him to formulate oppositions to Defendants' Motions for Summary Judgment. Additionally, three Motions for Summary Judgment have been filed in this matter and are comprised of voluminous documentation for Plaintiff's counsel and Plaintiff to review to formulate the Oppositions to the Motions for Summary Judgment.

Accordingly, Plaintiff shall have up to and including April 15, 2021, to respond to LVMPD's Motion for Summary Judgment (ECF #86).

Dated this 12th day of March, 2021

HATFIELD & ASSOCIATES

/s/ Trevor J. Hatfield

By: _____
 Trevor J. Hatfield, Esq. (SBN 7373)
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*Attorney for Plaintiff In conjunction with
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 Bono Project*

Dated this 12th day of March, 2021

KAEMPFER CROWELL

/s/ Ryan W. Daniels

By: _____
 LYSSA S. ANDERSON, ESQ. (SBN 5781)
 RYAN W. DANIELS, ESQ. (SBN 13094)
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*Attorneys for Las Vegas Metropolitan
 Police Department, Captain Nita Schmidt
 and Officer Hugh Hardy*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
 United States District Judge

DATED this 15th day of March, 2021,

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1 Dated this 12th day of March, 2021

2 **LEWIS BRISBOIS BISGAARD & SMITH, LLP**

3 */s/ Katherine J. Gordon*

4 By: _____

5 S. Brent Vogel, Esq. (SBN 6858)

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7 Las Vegas, Nevada 89118

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9 *Attorneys for Defendants NaphCare, Inc.,*

10 *Larry Williamson, M.D., and Ashley Komacsar,*

10 *Director of Nursing,*

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12
13
14 **ORDER**

15 **IT IS SO ORDERED:**

16 _____
17 UNITED STATES MAGISTRATE JUDGE

18 Dated: _____

19 CASE NO.: 2:18-cv-00169-RFB-BNW
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